

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

SCOTT WHITTINGTON

§
§
§
§
§

NO. 4:22CR

Judge

116
Jordan

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

FILED

MAY 12 2022

Clerk, U.S. District Court
Texas Eastern

Violation: 18 U.S.C. § 922(g)(1)
(Felon in Possession of Firearms)

On or about April 26, 2022, in the Eastern District of Texas, **Scott Whittington**, defendant, did knowingly and unlawfully possess in and affecting interstate or foreign commerce, the following firearms:

1. Askari Fabrika (Ankara Turkey), 1938 (Mauser type), 8mm caliber rifle bearing serial number 1536;
2. Israel Weapon Industries, TS12/Tavor TS12, 12-gauge shotgun bearing serial number H0016031;
3. Sig Sauer, 716, 7.62 mm caliber rifle bearing serial number 22P125476;
4. Armelegant (Turkey), SLBX3, 12-gauge shotgun bearing serial number 52-H21PT-013187;
5. Bushmaster Firearms, XM15-E2S, .223 caliber rifle bearing serial number L000471;
6. Benelli, M1 Super 90, 12-gauge shotgun bearing serial number M200801;
7. Colt, M4 Carbine, 5.56 mm caliber rifle bearing serial number LE411617;

8. Israel Weapon Industries, Galil ACE SAR, 7.62 mm caliber rifle bearing serial number G2012814;
9. Colt Defense, AR-15A3 Tactical Carbine, .223 caliber rifle bearing serial number LBD034061;
10. Israel Weapon Industries, TS12/Tavor TS12, 12-gauge shotgun bearing serial number B0004933;
11. Rock River Arms, LAR-15, 5.56 mm caliber rifle bearing serial number CM217689;
12. Beretta, ARX100, 5.56 mm caliber rifle bearing serial number SX15605;
13. Sigarms (Swiss), SG 551-2, unknown caliber bearing serial number 0458;
14. Colt Defense, M4 Carbine, 5.56 mm caliber rifle bearing serial number LE507037;
15. Colt Defense, M4 Carbine, 5.56 mm caliber rifle bearing serial number LE566498;
16. Benelli, Super Nova, 12-gauge shotgun bearing serial number Z948401M20;
17. Patriot Ordnance Factory (POF USA), P-416, .233 (multi-cal) pistol bearing serial number 07-02663;
18. Remington Arms Company, R4, 5.56 mm caliber rifle bearing serial number DL044389;
19. Rock River Arms, LAR-15, 5.56 mm caliber rifle bearing serial number CM177533;
20. Beretta, ARX100, 5.56 mm caliber rifle bearing serial number SX15555;
21. DS Arms, ZM4, 5.56 mm caliber rifle bearing serial number DSF001864;
22. DS Arms, ZM4, 5.56 mm caliber rifle bearing serial number DSF010046;
23. Ceska Zbrojovka (CZ), Scorpion Evo 3 S1, 9mm caliber pistol bearing serial number F051082;
24. Bushmaster Firearms, XM15-E2S, .223 caliber rifle bearing serial number BFIT038618;
25. Bushmaster Firearms, XM15-E2S, .223 caliber rifle bearing serial number L512720;
26. DS Arms, ZM4, multi caliber rifle bearing serial number DSF010045;

27. Bushmaster Firearms, XM15-E2S, 5.56 mm caliber rifle bearing serial number ARA018896;
28. Steyr Arms, AUG/A3 M1, .223 caliber rifle bearing serial number 16USA300;
29. Benelli, M1 Super 90, 12-gauge shotgun bearing serial number M254922;
30. Rock River Arms, LAR 8, 7.62 mm caliber rifle bearing serial number UT107602;
31. Bushmaster Firearms, XM15-E2S, 5.56 mm caliber rifle bearing serial number BFH020813;
32. Ceska Zbrojovka (CZ), Scorpion Evo 3 S1, 9mm caliber pistol bearing serial number E023311;
33. Glock, model 20, 10mm caliber pistol bearing serial number CNS445US;
34. Israel Weapon Industries, Uzi Pro, 9mm caliber pistol bearing serial number U1001103;
35. Sig Sauer, SP2022, 9mm caliber pistol bearing serial number 24B287939;
36. Walther, P5, 9mm caliber pistol bearing serial number 032578; and
37. Bushmaster Firearms, XM15-E2S, .223/5.56 caliber rifle bearing serial number L2008420;

while knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18 U.S.C. § 922(g)(1).

Count Two

Violation: 18 U.S.C. § 922(g)(1)
(Felon in Possession of
Ammunition)

On or about April 26, 2022, in the Eastern District of Texas, **Scott Whittington**, defendant, did knowingly and unlawfully possess in and affecting interstate or foreign commerce, approximately 91,520 rounds of various caliber ammunition, while knowing

that he had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18 U.S.C. § 922(g)(1).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
(Pursuant to 18 U.S.C. § 924(d)(1) by 28 U.S.C. § USC 2461(c))

As a result of the commission of the foregoing offense(s) charged in this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) by 28 U.S.C. § 2461(c), any firearms or ammunition involved in a violation of 18 U.S.C. § 922(g)(1), namely, the following:

1. Askari Fabrika (Ankara Turkey), 1938 (Mauser type), 8mm caliber rifle bearing serial number 1536;
2. Israel Weapon Industries, TS12/Tavor TS12, 12-gauge shotgun bearing serial number H0016031;
3. Sig Sauer, 716, 7.62 mm caliber rifle bearing serial number 22P125476;
4. Armelegant (Turkey), SLBX3, 12-gauge shotgun bearing serial number 52-H21PT-013187;
5. Bushmaster Firearms, XM15-E2S, .223 caliber rifle bearing serial number L000471;
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7. Colt, M4 Carbine, 5.56 mm caliber rifle bearing serial number LE411617;
8. Israel Weapon Industries, Galil ACE SAR, 7.62 mm caliber rifle bearing serial number G2012814;
9. Colt Defense, AR-15A3 Tactical Carbine, .223 caliber rifle bearing serial number LBD034061;
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33. Glock, model 20, 10mm caliber pistol bearing serial number CNS445US;
34. Israel Weapon Industries, Uzi Pro, 9mm caliber pistol bearing serial number U1001103;
35. Sig Sauer, SP2022, 9mm caliber pistol bearing serial number 24B287939;
36. Walther, P5, 9mm caliber pistol bearing serial number 032578;
37. Bushmaster Firearms, XM15-E2S, .223/5.56 caliber rifle bearing serial number L2008420; and
38. All ammunition involved in this case.

A TRUE BILL



GRAND JURY FOREPERSON

BRIT FEATHERSTON
UNITED STATES ATTORNEY



TRACEY M. BATSON
Assistant United States Attorney

Date: 5/11/22

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NOTICE OF PENALTY

Counts One and Two

Violation: 18 U.S.C. § 922(g)(1)

Penalty: Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both; and a term of supervised release of not more than three (3) years.

If the Court determines that the defendant is an Armed Career Offender under 18 U.S.C. 924(e), imprisonment of not less than 15 years and not more than life, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both; and a term of supervised release of not more than five (5) years.

Special Assessment: \$ 100.00 for each count.